

The Manifest Information Management System (DIRS 148160-MIMS 1992, all) calculated the total radionuclide inventory the Beatty facility received from 1986 through 1992, which represents 29 percent of the total undecayed inventory at that facility. Even if multiplied by a factor of 3 to 4 to compensate for the period (1962 to 1985) for which the Manifest Information Management System did not provide information, the source term represents a small percentage of the radionuclide source term immediately available for groundwater transport from the repository when the first waste packages initially degrade (that is, 2 percent of the total repository radionuclide source term). Therefore, cumulative long-term impacts from the Beatty Low-Level Radioactive Waste Disposal Facility with the repository would be very small.

The U.S. Ecology Hazardous Waste Treatment, Storage and Disposal Facility is a Resource Conservation and Recovery Act-permitted facility, with engineered barriers and systems and administrative controls that minimize the potential for offsite migration of hazardous constituents.

## **8.4 Cumulative Transportation Impacts**

This section discusses the results of the cumulative impact analysis of transportation. Paralleling the transportation analyses of the Proposed Action in Chapter 6, potential national transportation cumulative impacts from Inventory Module 1 or 2, and past, present, and reasonably foreseeable future actions, are presented in Section 8.4.1. Potential cumulative impacts with construction and operation of the Nevada transportation implementing rail and heavy-haul truck alternatives are included in Section 8.4.2.

The shipment of Inventory Module 1 or 2 to the repository would use the same transportation routes, but would take more shipments and an additional 14 years compared to the Proposed Action. Table 8-2 lists the estimated number of shipments for Modules 1 and 2. Impacts from Module 1 or 2 would be similar because the shipping rate would be the same for spent nuclear fuel and high-level radioactive waste and only about 3 percent more shipments would be made over the 38-year period under Module 2 to transport Greater-Than-Class-C and Special-Performance-Assessment-Required wastes. Because the difference in impacts between Inventory Modules 1 and 2 would be small, the following discussions present the impacts from both modules as being the same.

### **8.4.1 NATIONAL TRANSPORTATION**

This section describes cumulative impacts from national transportation. Section 8.4.1.1 presents potential cumulative impacts from shipping Inventory Module 1 or 2 from commercial nuclear generating sites and DOE facilities to the proposed Yucca Mountain Repository (Section 8.4.1.1). Section 8.4.1.2 presents potential cumulative national transportation impacts for the Proposed Action and Module 1 or 2 when combined with past, present, and reasonably foreseeable future shipments of radioactive material.

#### **8.4.1.1 Inventory Module 1 or 2 Impacts**

This section describes the potential cumulative impacts of loading operations at generating sites and incident-free radiological impacts, vehicle emission impacts, and accident impacts associated with transportation activities for Inventory Module 1 or 2. Cumulative impact results are provided for the mostly legal-weight truck and mostly rail scenarios which are described in Chapter 6. The section also describes potential cumulative impacts from transportation of other materials, personnel, and repository-generated waste for Modules 1 or 2. Appendix J contains additional detailed analysis results.

Loading operations would be extended for an additional 14 years to load the greater quantities of spent nuclear fuel and high-level radioactive waste under Inventory Module 1 or 2. The impacts of routine loading operations described for the Proposed Action in Chapter 6, Section 6.2.2, would increase for Module 1 or 2 due to the additional inventory. Therefore, the increase in dose to the public would be

about 42 person-rem based on 0.001 person-rem per metric ton of heavy metal and 42,000 additional MTHM (46,000 tons) (DIRS 104731-DOE 1986, Volume 2, p. E.6) for Modules 1 and 2. This dose could result in an additional 0.02 cancer fatality in the exposed population. Table 8-54 lists estimated radiological and industrial hazard impacts to involved workers for the routine loading operations under Module 1 or 2. The Proposed Action impacts are listed for comparison.

**Table 8-54.** Radiological and industrial hazard impacts to involved workers from loading operations.<sup>a,b</sup>

Impact	Proposed Action <sup>b</sup>		Inventory Module 1 or 2	
	Mostly legal-weight truck scenario	Mostly rail scenario	Mostly legal-weight truck scenario	Mostly rail scenario
<i>Radiological</i>				
Maximally exposed individual				
Dose (rem) <sup>c</sup>	12	12	12	12
Probability of latent cancer fatalities	0.005	0.005	0.005	0.005
Involved worker population				
Dose (person-rem)	15,000	4,200	32,000	8,400
Number of latent cancer fatalities	6.0	1.7	13	3.4
<i>Industrial hazards</i>				
Total recordable cases <sup>d</sup>	380	130	770	260
Lost workday cases <sup>e</sup>	200	70	400	130
Fatalities <sup>f</sup>	0.88	0.3	1.8	0.6

a. Includes all involved workers at all facilities and does not vary by operating mode.

b. Source: Chapter 6, Section 6.2.

c. Assumes 500 millirem per year to radiation workers. The average individual exposure was assumed to be 24 years for both the Proposed Action and Inventory Module 1 or 2 since 24 years is a conservatively long time to assume an individual would be involved in loading operations.

d. Total recordable cases based on a loss incidence rate of 0.084.

e. Lost workday cases based on a loss incidence rate of 0.046.

f. Fatalities based on a loss incidence rate of 0.000218.

Because noninvolved workers would not have tasks that involved radioactive exposure, there would be no or very small radiological impacts to noninvolved workers. For the reasons identified in Chapter 6, Section 6.2.2.2, industrial hazard impacts to noninvolved workers would be about 25 percent of the impacts to the individual worker shown in Table 8-54.

The impacts of loading accident scenarios under Inventory Module 1 or 2 would be the same as those described for the Proposed Action in Chapter 6, Section 6.2.4.1. The same type of single accident event and its impacts are applicable to shipments under the Proposed Action or Module 1 or 2. As summarized in Chapter 6, Section 6.2.4.1, the analysis results indicate that there would be no or very small potential radiological consequences from loading accident scenarios involving spent nuclear fuel or high-level radioactive waste. These consequences would bound the consequences from similar accidents involving Greater-Than-Class-C or Special-Performance-Assessment-Required waste because of the lower available radionuclide inventory (see Appendix A).

Table 8-55 lists radiological impacts to involved workers and the public and vehicle emission impacts from incident-free transportation for the mostly legal-weight truck and mostly rail scenarios. The analysis of impacts for the mostly legal-weight truck scenario assumed that shipments would use commercial motor carriers for highway transportation and general freight commercial services for rail transportation for the naval spent fuel shipments that cannot be transported by legal-weight trucks. The mostly rail analysis accounts for legal-weight truck shipments that would occur for the commercial nuclear generator sites that do not currently have the capacity to handle or load rail casks. In addition, for the mostly rail analysis, DOE assumed that it would use either a branch rail line or heavy-haul trucks in conjunction with an intermodal transfer station in Nevada to transport the large rail casks to and from the

**Table 8-55.** Radiological and vehicle emission impacts from incident-free national transportation.

Category	Proposed Action <sup>a,b</sup>		Inventory Module 1 or 2 <sup>c</sup>	
	Mostly legal-weight truck scenario <sup>d</sup>	Mostly rail scenario <sup>e</sup>	Mostly legal-weight truck scenario <sup>d</sup>	Mostly rail scenario <sup>e</sup>
<i>Involved worker</i>				
Collective dose (person-rem)	14,000	3,700 - 4,600	28,000	7,100 - 8,800
Estimated number of latent cancer fatalities	5.6	1.5 - 1.9	11.2	2.8 - 3.5
<i>Public</i>				
Collective dose (person-rem)	5,000	1,200 - 1,600	9,700	2,200 - 3,100
Estimated number of latent cancer fatalities	2.5	0.6 - 0.82	5.0	1.1 - 1.6
<i>Estimated vehicle emission-related fatalities</i>	0.95	0.5 - 0.8	1.9	0.9 - 1.4

a. Source: Chapter 6, Section 6.2.3.

b. Impacts are totals for shipments over 24 years.

c. Impacts are totals for shipments over 38 years.

d. Includes rail shipments of naval spent nuclear fuel to Nevada, and intermodal transfer station and heavy-haul truck operations for this fuel in Nevada.

e. Includes legal-weight truck shipments from commercial nuclear generator sites that do not have the capacity to handle or load rail casks, and the rail and heavy-haul truck implementing alternatives for Nevada described in Chapter 6.

repository. The range provided in the table for the mostly rail scenario addresses the different possible rail and heavy-haul truck implementing alternatives described in Chapter 6. The lower end of the range reflects use of a branch rail line in Nevada and the upper end of the range reflects use of heavy-haul trucks in Nevada. The involved worker impacts in Table 8-55 include estimated radiological exposures of truck and rail transportation crews and security escorts for legal-weight truck and rail shipments; the public doses account for the public along the route, the public sharing the route, and the public during stops. The Inventory Module 1 or 2 impacts would exceed those of the Proposed Action due to the additional number of shipments.

DOE does not expect radiological impacts for maximally exposed individuals to change from the Proposed Action due to the conservative assumptions used in the analysis of the Proposed Action (see Chapter 6, Section 6.2.3). The assumptions for estimating radiological dose include the use of the maximum allowed dose rate and conservative estimates of exposure distance and time. For example, the U.S. Department of Transportation maximum allowable dose rate of 10 millirem per hour at a distance of 2 meters (6.6 feet) [40 CFR 173.44(b)] was used for estimating exposure to individuals. In addition, the conservative assumptions for exposure distance and time for workers (that is, crew members, inspectors, railyard crew member) and the public (that is, resident along route, person in a traffic jam, person at a service station, resident near a rail stop) for the Proposed Action are unlikely to be exceeded for Inventory Module 1 or 2 (see Chapter 6, Section 6.2.3).

Table 8-56 lists the radiological accident risk and traffic fatalities for transportation by mostly legal-weight truck and mostly rail for Inventory Module 1 or 2. The radiological accident risk measures the total impact of transportation accidents over the entire shipping campaign (24 years for the Proposed Action and 38 years for Module 1 or 2). The consequences from a maximum reasonably foreseeable accident scenario would be identical to those discussed for the Proposed Action (see Chapter 6, Sections 6.2.4.2.1 and 6.2.4.2.2) because the parameters and conditions for the hypothetical accident event involving spent nuclear fuel or high-level radioactive waste would be the same for a shipment under the Proposed Action or Module 1 or 2. In addition, the hypothetical accident would be bounding for accident scenarios involving Greater-Than-Class-C and Special-Performance-Assessment-Required wastes.

As summarized in Chapter 6, Section 6.1.3, and further described in Appendix J, in addition to the transportation of spent nuclear fuel and high-level radioactive waste to the repository, other materials

**Table 8-56.** Accident risk for mostly legal-weight truck and mostly rail scenarios.

Category	Proposed Action <sup>a</sup>		Inventory Module 1 or 2	
	Mostly legal-weight truck scenario	Mostly rail scenario	Mostly legal-weight truck scenario	Mostly rail scenario
<i>Radiological accident risk</i>				
Collective dose risk (person-rem)	0.46	0.8 - 1.0	0.87	1.3 - 1.6
Estimated number of latent cancer fatalities	0.00023	0.00041 - 0.00050	0.00043	0.00066 - 0.00080
<i>Traffic accident fatalities</i>	4.9	2.3 - 3.1	8.7	4.2 - 5.9

a. Source: Chapter 6, Section 6.2.4.2.

would require transportation to and from the proposed repository. These materials would include construction materials, consumables, repository components (disposal containers, drip shields, etc.), office and laboratory supplies, mail, and laboratory samples. Required transportation would also include personnel commuting to the Yucca Mountain site and the shipment of repository-generated wastes offsite for treatment, storage, or disposal.

The implementation of Inventory Module 1 or 2 would increase this transportation as a result of the additional required subsurface development and the longer time required for repository development, emplacement, and closure. However, even with the increased transportation of other material, personnel, and repository-generated wastes for Module 1 or 2, DOE would expect these transportation impacts to be small contributors to the total transportation impacts on a local, state, and national level with no large cumulative impacts based on the analysis of the Proposed Action in Section 6.1.3. The annual air quality impacts for Inventory Module 1 or 2 would be the same as those conservatively estimated in Section 6.1.3 and, therefore, no cumulative air quality impacts would be expected in the Las Vegas airshed, which is in nonattainment for carbon monoxide. Table 8-57 summarizes fatalities from transporting other materials, personnel, and repository-generated waste. The estimated fatalities assume truck shipments in Nevada which would have higher potential impacts than shipments by rail. The Proposed Action impacts are listed in the table for comparison.

**Table 8-57.** Impacts from transportation of materials, consumables, personnel, and waste.<sup>a,b</sup>

Category	Proposed Action		Inventory Module 1 or 2	
	Kilometers traveled <sup>c</sup>	Fatalities	Kilometers traveled (Module 1/Module 2)	Fatalities (Module 1/Module 2)
<i>Materials</i> (including repository components)	130,000,000 - 270,000,000	4.1 - 7.8	170,000,000 - 310,000,000	5.6 - 9.8
<i>Personnel</i>	480,000,000 - 800,000,000	5.4 - 9.2	640,000,000 - 930,000,000	7.3 - 11
<i>Repository-generated waste</i>				
Hazardous	57,000 - 71,000	0.001 - 0.002	110,000 - 170,000	0.002 - 0.003
Low-level radioactive	230,000 - 320,000	0.004 - 0.006	430,000 - 1,000,000	0.008 - 0.02
Nonhazardous solid	5,600,000 - 10,400,000	0.1 - 0.2	7,000,000 - 9,500,000	0.13 - 0.18
<b>Totals</b>	<b>610,000,000 - 1,100,000,000</b>	<b>9.6 - 17</b>	<b>820,000,000 - 1,300,000,000</b>	<b>13 - 20</b>

a. Totals might differ from sums of values due to rounding.

b. Source: Appendix J, Section J.3.6.

c. To convert kilometers to miles, multiply by 0.62137.

#### 8.4.1.2 Cumulative Impacts from the Proposed Action, Inventory Module 1 or 2, and Other Federal, Non-Federal, and Private Actions

The overall assessment of cumulative national transportation impacts for past, present, and reasonably foreseeable future actions concentrated on the cumulative impacts of offsite transportation, which would yield potential radiation doses to a greater portion of the general population than onsite transportation and would result in fatalities from traffic accidents. The collective dose to workers and to the general population was used to quantify overall cumulative radiological transportation impacts. This measure

was chosen because it could be related directly to latent cancer fatalities using a cancer risk coefficient and because of the difficulty in identifying a maximally exposed individual for shipments throughout the United States from 1943 through 2047. Operations at the Hanford Site and the Oak Ridge Reservation began in 1943, and 2047 is when the EIS analysis assumed that radioactive material shipments to the repository for Inventory Module 1 or 2 would end. The source of this cumulative transportation impacts analysis is the Yucca Mountain EIS Environmental Baseline File on transportation (DIRS 104800-CRWMS M&O 1999, Section 7.0), with the exception of impacts from the Proposed Action and Module 1 or 2, which are from Table 8-55.

The cumulative impacts of the transportation of radioactive material would consist of impacts from:

- Historic DOE shipments of radioactive material associated with the Nevada Test Site, the Idaho National Engineering and Environmental Laboratory, the Savannah River Site, the Hanford Site, the Oak Ridge Reservation, and naval spent nuclear fuel and test specimens
- Reasonably foreseeable actions that include the transportation of radioactive material identified in DOE Environmental Policy Act analyses; for example, the Nevada Test Site Environmental Impact Statement (DIRS 101811-DOE 1996, all), the Department of Energy Spent Nuclear Fuel Management Environmental Impact Statement (DIRS 101802-DOE 1995, all; DIRS 101812-DOE 1996, all), and the Final Department of Energy Waste Management Environmental Impact Statement (DIRS 101816-DOE 1997, all) (see Table 8-58). In some cases, transportation impacts included impacts that may have been double counted. For example, the transportation impacts from shipping 40,000 MTHM of spent nuclear fuel to a potential Private Fuel Storage Facility in Tooele County, Utah (DIRS 152001-NRC 2000, all) were included in Table 8-58, but the transportation impacts from the Proposed Action were not decreased to account for this 40,000 MTHM. Table 8-58 also includes reasonably foreseeable projects that include limited transportation of radioactive material (for example, shipment of submarine reactor components from the Puget Sound Naval Shipyard to the Hanford Site for burial, and shipments of uranium billets and low-specific-activity nitric acid from the Hanford Site to the United Kingdom). In addition, for reasonably foreseeable future actions where a preferred alternative was not identified or a Record of Decision has not been issued, the analysis used the alternative estimated to result in the largest transportation impacts. While this is not an exhaustive list of the projects that could include limited transportation of radioactive material, it indicates that the transportation impacts associated with such projects are low in comparison to major projects or general transportation.
- General radioactive materials transportation that is not related to a particular action; for example, shipments of radiopharmaceuticals to nuclear medicine laboratories and shipments of commercial low-level radioactive waste to commercial disposal facilities
- Shipments of spent nuclear fuel, high-level radioactive waste, Greater-Than-Class-C waste, and Special-Performance-Assessment-Required waste under the Proposed Action or Inventory Module 1 or 2

Table 8-58 summarizes the worker and general population doses from the transport of radioactive material. The estimated total cumulative transportation-related collective worker doses from the mostly legal-weight truck shipments (past, present, and reasonably foreseeable actions) with the Proposed Action would be about 360,000 person-rem (140 latent cancer fatalities), and with Inventory Module 1 or 2 about 410,000 person-rem (160 latent cancer fatalities). The estimated total general population doses for the mostly legal-weight truck shipments would be about 320,000 person-rem (160 latent cancer fatalities) with the Proposed Action, and about 350,000 person-rem (180 latent cancer fatalities) with Module 1 or 2. Most of the dose for workers and the general population would be due to general transportation of radioactive material. The estimated total cumulative number (workers plus population) of latent cancer fatalities with the Proposed Action would be about 300, and about 340 with Module 1 or 2. To place



**Table 8-58.** Cumulative transportation-related radiological doses, latent cancer fatalities, and traffic fatalities.<sup>a</sup>

Category	Worker dose (person-rem)	General population dose (person-rem)	Traffic fatalities
<i>Historical DOE shipments</i> (DIRS 101811-DOE 1996, all)	330	230	NL <sup>b</sup>
<i>Reasonably foreseeable actions</i>			
Private Fuel Storage Facility (DIRS 152001-NRC 2000, all)	29	190	0.78
Sodium-Bonded Spent Nuclear Fuel (DIRS 157167-DOE 2000, all)	0.0044	0.032	0.0001
Idaho High-Level Waste and Facilities (DIRS 155100-DOE 1999, all)	530	2,900	0.1
Surplus Plutonium Disposition (DIRS 118979-DOE 1999, all)	60	67	0.053
Sandia National Laboratories Site-Wide EIS (DIRS 157155-DOE 1999, all)	94	590	1.3
Depleted Uranium Hexafluoride (DIRS 152493-DOE 1999, all)	-- <sup>c</sup>	750	4
Tritium Production in a Commercial Light Water Reactor (DIRS 157166-DOE 1999, all)	16	80	0.06
Parallex Project (DIRS 157153-DOE 1999, all)	0.00001	0.00007	0.00005
Los Alamos National Laboratory Site-Wide EIS (DIRS 157154-DOE 1999, all)	580	310	8
Plutonium Residues at Rocky Flats (DIRS 155932-DOE 1998, all)	2.1	1.3	0.0078
Import of Russian Plutonium-238 (DIRS 157156-DOE 1993, all)	1.8	4.4	0.0036
Nevada Test Site expanded use (DIRS 101811-DOE 1996, all)	--	150 <sup>d</sup>	8
Spent nuclear fuel management (DIRS 101802-DOE 1995, all; DIRS 101812-DOE 1996, all)	360	810	0.77
Waste Management PEIS (DIRS 101816-DOE 1997, all) <sup>e</sup>	16,000	20,000	36
Waste Isolation Pilot Plant (DIRS 101814-DOE 1997, all)	790	5,900	5
Molybdenum-99 production (DIRS 101813-DOE 1996, all)	240	520	0.1
Tritium supply and recycling (DIRS 103208-DOE 1995, all)	--	--	0.029
Surplus HEU disposition (DIRS 103216-DOE 1996, all)	400	520	1.1
Storage and Disposition of Fissile Materials (DIRS 103215-DOE 1996, all)	--	2,400 <sup>d</sup>	5.5
Stockpile Stewardship (DIRS 103217-DOE 1996, all)	--	38 <sup>d</sup>	0.064
Pantex (DIRS 103218-DOE 1996, all)	250 <sup>f</sup>	490 <sup>d</sup>	0.006
West Valley (DIRS 101729-DOE 1996, all)	1,400	12,000	3.6
S3G and D1G prototype reactor plant disposal (DIRS 103221-DOE 1997, all)	2.9	2.2	0.010
S1C prototype reactor plant disposal (DIRS 103219-DOE 1996, all)	6.7	1.9	0.0037
Container system for Naval spent nuclear fuel (DIRS 101941-USN 1996, all)	11	15	0.045
Cruiser and submarine reactor plant disposal (DIRS 103479-USN 1996, all)	5.8	5.8	0.00095
Submarine reactor compartment disposal (DIRS 103477-USN 1984, all)	--	0.053	NL
Uranium billets (DIRS 103189-DOE 1992, all)	0.50	0.014	0.00056
Nitric acid (DIRS 103212-DOE 1995, all)	0.43	3.1	NL
<i>General radioactive material transportation</i>			
1943 to 2033	310,000	260,000	19
1943 to 2047	330,000	290,000	22
<b><i>Subtotal of non-repository-related transportation impacts</i></b>			
<b>1943 to 2033</b>	<b>330,000</b>	<b>310,000</b>	<b>94</b>
<b>1943 to 2047</b>	<b>350,000</b>	<b>340,000</b>	<b>97</b>
<i>Proposed Action</i>			
Mostly legal-weight truck	29,000	5,000	4.5
Mostly rail	7,900 - 8,800	1,200 - 1,600	2.3 - 3.1
<i>Module 1 or 2<sup>g</sup></i>			
Mostly legal-weight truck	60,000	9,700	8.7
Mostly rail	16,000 - 17,000	2,200 - 3,100	4.2 - 5.9
<i>Total collective dose (total latent cancer fatalities)<sup>h</sup> and total traffic fatalities</i>			
<i>Proposed Action</i>			
Mostly legal-weight truck	360,000 (140)	320,000 (160)	98
Mostly rail	340,000 (140)	310,000 (160)	97
<i>Module 1 or 2<sup>g</sup></i>			
Mostly legal-weight truck	410,000 (160)	350,000 (180)	110
Mostly rail	370,000 (150)	340,000 (170)	100

a. Sources: DIRS 104800-CRWMS M&O (1999, Section 7) except for the Proposed Action and Inventory Module 1 or 2, which are from Table 8-54. All references in this table refer to the original source of information cited in DIRS 104800-CRWMS M&O (1999, Section 7).

b. NL = not listed.

c. -- = reported or included with the general population dose.

d. Includes worker and general population doses.

e. Includes mixed low-level waste and low-level waste; transuranic waste included in DIRS 101814-DOE (1997, Volume 1).

f. Includes all highly enriched uranium shipped to Y-12.

g. The transportation-related radiological collective doses for Inventory Module 1 or 2 include the doses from the Proposed Action (see the definition of Modules 1 and 2 in Section 8.1.2.1).

h. The conversion factors for worker and general population dose to latent cancer fatalities are 0.0004 and 0.0005 latent cancer fatality per person-rem, respectively (DIRS 101856-NCRP 1993, p. 31) occurred in the United States. Therefore, the number of vehicular accident fatalities was used to quantify the cumulative impacts of transportation accidents.

these numbers in perspective, there were 541,532 deaths in the United States during 1998 due to cancer, although the number for any given year understandably fluctuates (DIRS 153066-Murphy 2000, p. 83). This section presents an estimate of latent cancer fatalities slightly greater than 300 over a period of about 100 years (that is, an average of about 3 latent cancer fatalities per year). This value would be indistinguishable from the natural fluctuations in the death rate from cancer.

For transportation accidents involving radioactive material, the dominant risk is due to accidents that are not related to the cargo (traffic or vehicular accidents). Typically, the radiological accident risk (latent cancer fatalities) from transportation accidents is less than 1 percent of the vehicular accident risk (see Table 8-56). In addition, no acute radiological fatalities due to transportation accidents have ever occurred in the United States. Therefore, the number of vehicular accident fatalities was used to quantify the cumulative impacts of transportation accidents.

From 1943 through 2033 an estimated 4 million people would be killed in motor vehicle accidents and 180,000 people would be killed by railroad accidents. From 1943 through 2047, an estimated 4.4 million people would be killed in motor vehicle accidents and 200,000 people would be killed in railroad accidents. Based on the estimated number of traffic fatalities for the reasonably foreseeable actions and for the Proposed Action and Inventory Module 1 or 2 listed in Table 8-58, the transport of radioactive material would contribute about 110 fatalities to these totals.

#### **8.4.2 NEVADA TRANSPORTATION**

This section analyzes potential cumulative impacts that Inventory Module 1 or 2 and past, present, and other reasonably foreseeable future Federal, non-Federal, and private actions could have on the construction and operation of a branch rail line or the construction and operation of an intermodal transfer station and associated highway upgrades for heavy-haul trucks in the State of Nevada. The analysis included potential cumulative impacts in the vicinity of the five potential branch rail line corridors, the three potential intermodal transfer station locations, and the five associated potential highway routes for heavy-haul trucks.

With respect to potential cumulative impacts from Inventory Module 1 or 2, there would be no cumulative construction impacts because the need for a new branch rail line or new intermodal transfer station and associated highway upgrades for heavy-haul trucks would not change; that is, whatever DOE would build for the Proposed Action would also serve Module 1 or 2. In addition, because the planned annual shipment rate of spent nuclear fuel and high-level radioactive waste to the Yucca Mountain Repository would be about the same for Module 1 or 2 and the Proposed Action, the only cumulative operations impacts would result because of the extra 14 years of shipping time required for Module 1 or 2. With this basis, the operation and maintenance of a branch rail line or an intermodal transfer station and associated highway route for heavy-haul trucks were analyzed for potential cumulative impacts from Module 1 or 2.

Land-use and ownership impacts identified in Chapter 6 (Section 6.3) would be avoided or otherwise resolved to implement the Proposed Action. However, additional conflicts associated with continued use of the affected land areas could occur due to shipping operations being excluded 14 years beyond that analyzed in the Proposed Action. DOE expects no cumulative impacts from the extended 14 years of operation for Inventory Module 1 or 2 to air quality; hydrology (surface water and groundwater); biological resources and soils; cultural resources; socioeconomics; noise; aesthetics; and utilities, energy, and materials, the impacts of which were assessed on a per shipment, weekly, or annual basis (see Chapter 6, Section 6.3).

Cumulative impacts from Inventory Module 1 or 2 to occupational and public health and safety are included in the occupational and public health and safety impacts of national transportation in

Section 8.4.1. The operation of an intermodal transfer station for more years under Module 1 or 2 would affect waste management impacts. Because of the additional years of operation, more waste of the same types would be generated than for the Proposed Action. However, the small waste quantities generated for Module 1 or 2 would have a minimal impact to the receiving treatment and disposal facilities. Because there would be no large cumulative impacts for any of the resource areas from Module 1 or 2, disproportionately high and adverse cumulative impacts to minority or low-income populations or to Native Americans would be unlikely.

Other than Inventory Module 1 or 2, one other Federal action and several private actions could have the potential for cumulative impacts with the construction and operation of a new branch rail line or intermodal transfer station and associated highway route for heavy-haul trucks.

One private action that could lead to cumulative impacts with the Carlin rail corridor implementing alternative is by Cortez Gold Mine, Inc., which has an existing Pipeline Project mining operation and processing facility (DIRS 103078-BLM 1996, all), a proposed Pipeline Infiltration Project (DIRS 103081-BLM 1999, all), and a possible Pipeline Southeast Expansion Project (DIRS 103078-BLM 1996, p. 5-7) in the Crescent Valley area of Nevada through which the Carlin branch rail line would pass (see Section 8.1.2.3 and Figure 8-5). Because the Carlin corridor would pass through the general area of these projects, there could be cumulative land-use and ownership impacts that would require mitigation.

The analysis for the Carlin rail corridor represents the maximum impact; other rail corridor implementing alternatives would have smaller impacts. Cumulative impacts for the mostly legal-weight truck scenario would also have smaller impacts.

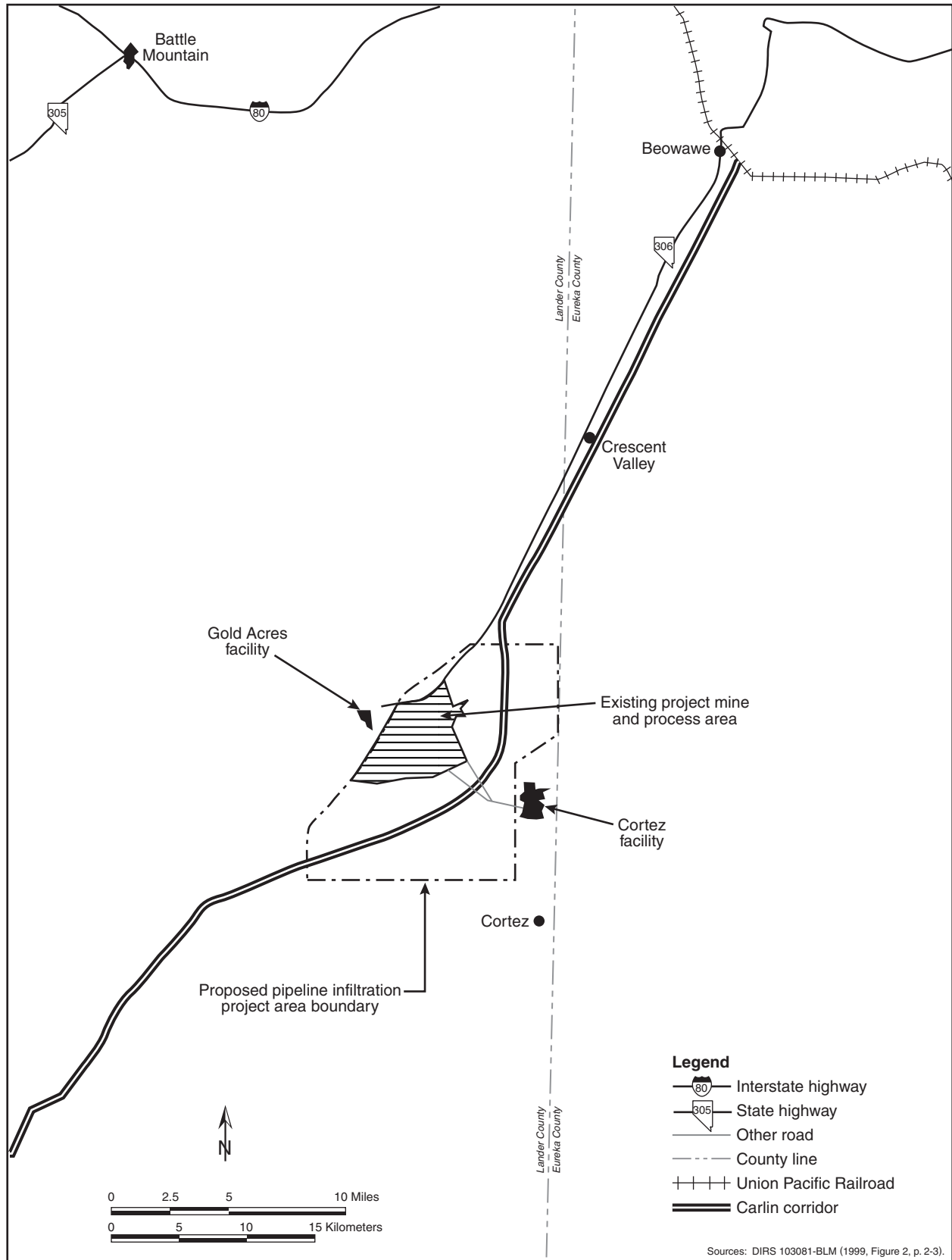
Another private action that could result in cumulative impacts would be shared use of a branch rail line that DOE constructed and operated to transport spent nuclear fuel and high-level radioactive waste to the Yucca Mountain Repository by others (for example, mine operators, private freight shippers) because of the increased rail traffic. Because predicting the increase in rail traffic is not possible at this time, this analysis cannot estimate the cumulative impacts. There could be some added impacts to all the resource areas beyond those evaluated for the Proposed Action in Chapter 6, but there could also be benefits from the improved economic potential for resource development in interior areas of Nevada as well as greater economic development potential for nearby communities. DOE would have to consider these impacts in any decision it made to allow shared use of the branch rail line.

One Federal action and one private action could lead to cumulative impacts with the construction and operation of the Caliente intermodal transfer station. DOE has specified the Caliente site as one of four possible locations for the construction and operation of an intermodal transfer station for the shipment of low-level radioactive waste to the Nevada Test Site (DIRS 103225-DOE 1998, pp. 2-4 to 2-12). In addition, a commercial venture planned by Apex Bulk Commodities for the Caliente site would construct an intermodal transfer station for the transport of copper concentrate. Figure 8-6 shows a possible layout plan for these intermodal transfer stations at Caliente. Section 8.1 provides more information on the potential DOE and Apex intermodal transfer stations. The following sections describe the potential cumulative impact analysis at the Caliente site from the construction and operation of an intermodal transfer station to support the proposed Yucca Mountain Repository, coupled with an intermodal transfer station for shipment of low-level radioactive waste to the Nevada Test Site and an intermodal transfer station proposed by Apex Bulk Commodities.

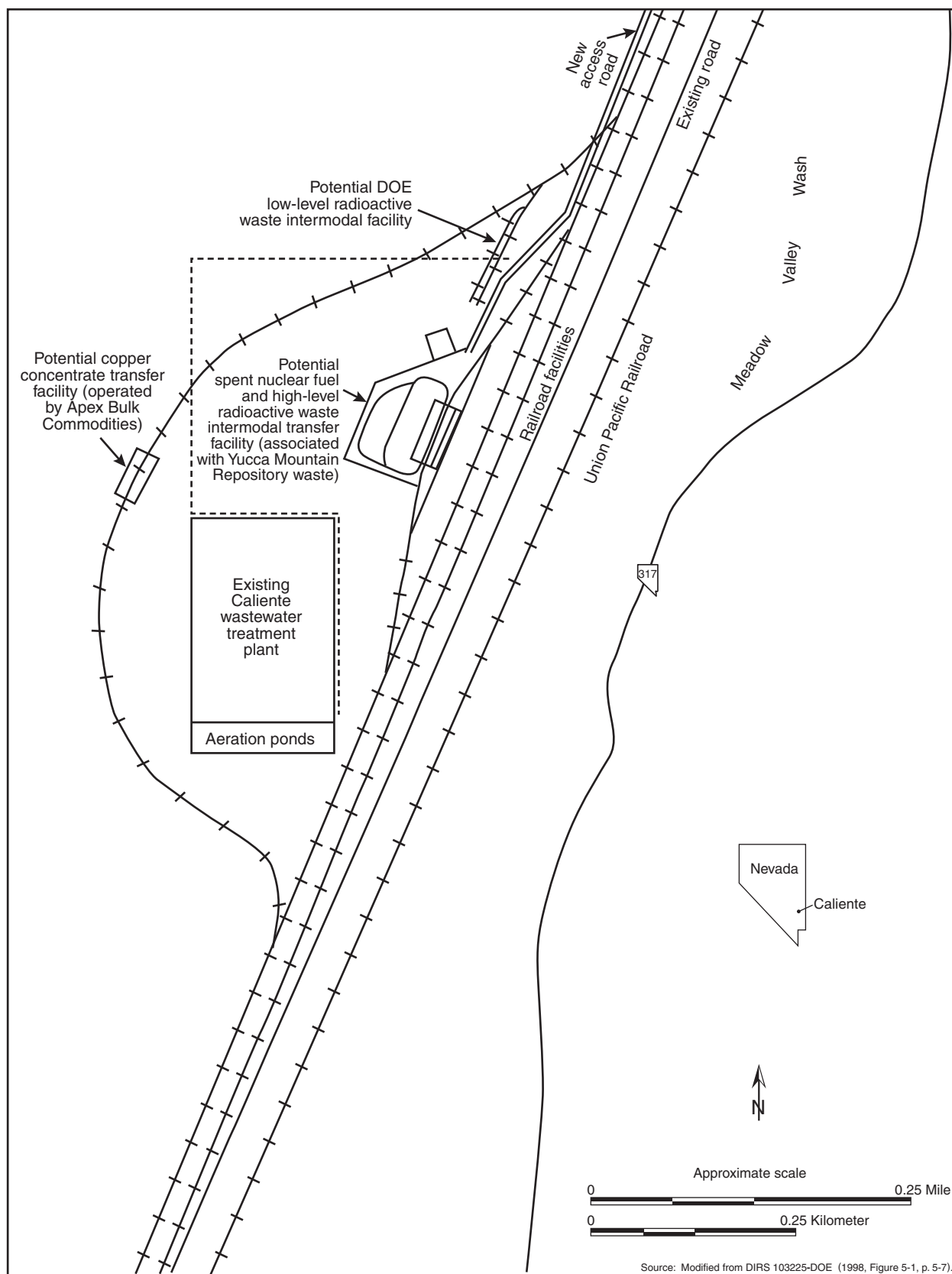
#### **8.4.2.1 Land Use and Ownership**

Chapter 6, Section 6.1.2.1, discusses reasonably foreseeable actions along the rail corridors and heavy-haul truck routes as they would apply to the Proposed Action. The differences in Module 1 and Module 2 in comparison to the Proposed Action are discussed below.





**Figure 8-5.** Cortez Gold Mine existing pipeline project and proposed pipeline infiltration project.



**Figure 8-6.** Potential locations of intermodal transfer stations at Caliente.

As discussed in Chapter 6, Section 6.3.2.1 there are currently 20 new electric generating plants proposed for the State of Nevada. Of these, 13 are proposed for Clark County in southern Nevada. Currently, plant details are not readily available for a detailed evaluation. However, should these plants be constructed, the rights-of-way necessary for transmission lines and/or natural gas supply lines will most likely be constructed on Bureau of Land Management lands. This would increase the amount of public lands in Nevada that would not be available to other users. Actual impacts associated with the rights-of-way, especially to the candidate rail corridors, would be similar to existing rights-of-way discussed in Section 6.3.2.1.

Section 6.3 of Chapter 6 and Section J.3.1.1 of Appendix J also discuss potential land use and ownership conflicts along candidate rail corridors that could result from the Proposed Action. These include potential conflicts with land areas on the Nellis Air Force Range, Timbisha Shoshone trust land parcel near Scottys Junction, Nevada, planned Ivanpah Valley regional airport, and wilderness study areas. If DOE decided to construct and operate a branch rail line in a rail corridor, it would avoid or mitigate any associated land use and ownership conflicts to implement the Proposed Action. However, additional conflicts associated with continued use of affected land areas could occur due to shipping operations being extended for 14 years beyond that of the Proposed Action.

The land required for the DOE low-level radioactive waste and Apex intermodal transfer stations would add to the approximately 0.21 square kilometer (50 acres) of property that would be required for the intermodal transfer station that would support the proposed Yucca Mountain Repository. The rail spur and facility for the low-level radioactive waste intermodal transfer station would disturb approximately 0.02 square kilometer (5 acres) of land. The Apex transfer facility would be in a building about 90 by 30 meters (300 by 100 feet). In addition, Apex would have a truck maintenance facility in a building about 30 by 18 meters (100 by 60 feet) that it could share with the low-level radioactive waste intermodal facility. The incremental impacts resulting from the changes in land use associated with the three intermodal transfer stations would not result in a substantial cumulative impact.

In addition to the cumulative changes in land use and ownership, DOE considered potential conflicts with plans and policies issued by various government entities along the alternative transportation corridors. In particular, DOE reviewed the Las Vegas 2020 Master Plan (DIRS 157274-City of Las Vegas 2001, all) and various other planning documents, including master plans for the Cities of Caliente (DIRS 157312-Sweetwater and Anderson 1992, all) and Alamo (DIRS 157275-Intertech and Sweetwater 1990, all), and the Lander County Revised Policy for Federally Administered Lands (DIRS 157310-Lander County 1999, all). The Las Vegas Master Plan provides broad policy direction for future land use decisions and related aspects in the City of Las Vegas through 2020. While the Alamo plan deals primarily with zoning issues, the Caliente plan discusses actions for dealing with potential population growth generated by the construction and operation of a repository at Yucca Mountain. The Caliente document generally expresses a need to annex lands that are contiguous to and south of the City in Meadow Valley Wash. The Caliente Intermodal Transfer Facility would be in Meadow Valley Wash (see Chapter 6, Figure 6-17). In general, local government policy indicates a goal of minimizing the conversion of private lands for public use. The transportation corridors and routes described in the EIS, particularly the rail corridors, were developed to minimize impacts to private lands. Section 6.3.2 discusses the amount of private land encountered along the rail corridors and a minimum-to-maximum range for each corridor, including variations and options. However, definitive information is not available on specific tracts of land that could be required for a specific transportation mode or route. Once DOE selected a transportation mode and a specific transportation corridor, more definitive information could be developed on potential conflicts with land uses and various agency plans and policies and, ultimately, the mitigation measures that could be needed to resolve conflicts and impacts on a given area.

#### **8.4.2.2 Air Quality**

Air quality cumulative impacts during construction of three intermodal transfer stations—one for intermodal transfers of casks containing spent nuclear fuel and high-level radioactive waste, one for intermodal transfers of low-level radioactive waste shipments to the Nevada Test Site, and one for intermodal transfers of Apex copper concentrate—would not be expected to occur since construction activities would likely occur at different times. The area in which the construction would occur is in attainment of the National Ambient Air Quality Standards and is outside of the Las Vegas Valley particulate matter (PM<sub>10</sub>) and carbon monoxide nonattainment areas. Even if construction for all three intermodal transfer stations occurred concurrently, administrative controls would be implemented to prevent an adverse impact from collective emissions and dust-generating activities.

Emissions from all sources would be less than applicable standards for repository activities. Emissions would also be below established standards for a mostly legal-weight truck transportation scenario. For a mostly rail scenario, criteria pollutants would be emitted during earthmoving operations for branch rail line or intermodal transfer station and highway upgrade construction projects. Cumulative impacts would be greatest for activities occurring in the Las Vegas air basin, which is currently in nonattainment for particulate matter (PM<sub>10</sub>) and carbon monoxide. For rail implementing alternatives, emissions into the Las Vegas air basin would exceed emission standards only for construction of a Valley Modified branch rail line. Emission standards could be exceeded by up to 90 percent for PM<sub>10</sub> and up to 60 percent for carbon monoxide. Emissions from upgrading highways for a Caliente/Las Vegas heavy-haul truck route could also exceed standards for the Las Vegas air basin. PM<sub>10</sub> emissions could slightly exceed the standard and carbon monoxide emissions could exceed the standard by 10 percent. All other activities would not cause emissions that exceeded emission standards.

During operations, there would be approximately one or two repository rail shipments and as many as 11 associated heavy-haul trucks a week, an average of about three trains and seven trucks a day for DOE low-level radioactive waste shipments, and one truck an hour for the Apex copper concentrate transport. At present, an average of one train an hour and light highway traffic travels through Caliente. The incremental increase in air pollutants from rail and highway traffic resulting from the three actions would cause slight, temporary increases in pollutants, but would not exceed Federal standards (Chapter 6, Section 6.3.2; DIRS 103225-DOE 1998, pp. 4-13, 5-4, and 5-8). Criteria pollutants released during routine operations of the intermodal transfer stations would include nitrogen dioxide, sulfur dioxide, carbon monoxide, and particulate matter. DOE expects these emissions would also be well within Federal standards.

#### **8.4.2.3 Hydrology**

##### ***Surface Water***

Mitigation measures used during the construction of the intermodal transfer stations would minimize surface-water impacts. Floodplain impacts probably would occur if DOE selected the Caliente intermodal transfer station (see Appendix L). If that location was selected, DOE would conduct a detailed floodplain/wetland assessment and integrate good construction practices to minimize impacts. Construction probably would involve some permanent drainage alterations. Runoff rates would differ from natural or existing terrain but, given the relatively small size of the area, there would be little effect on overall runoff quantities for the area (Chapter 6, Section 6.3.3.1; DIRS 103225-DOE 1998, pp. 4-13 and 5-8). DOE expects very small impacts to surface waters during the construction and operation of the stations.

##### ***Groundwater***

Construction activities for the intermodal transfer stations would disturb and loosen the ground for some time, which could result in higher infiltration rates. However, these activities and their resultant

short-term impacts probably would occur at different times for the three stations. The relatively small sizes of the three facilities would minimize changes in groundwater infiltration rates during operations. Potential sources of contamination would include one to three diesel fuel tanks for the standby generators and heavy equipment for all three stations. The small overall water demand could be met by installing wells or by existing water distribution systems. In addition, the operation of the Apex copper concentrate and DOE low-level radioactive waste intermodal transfer station would only overlap with the beginning years of spent nuclear fuel and high-level radioactive waste shipment to the proposed Yucca Mountain Repository.

#### **8.4.2.4 Biological Resources and Soils**

The proposed locations of the intermodal transfer stations are in an irrigated pasture area that is partly wetland. However, because the area was modified as pasture and the native habitat has been degraded, cumulative impacts to biological resources would be low. Construction activities could lead to soil erosion. Water would be applied to suppress dust and compact soil. The operation of the stations would have small cumulative impacts on soils. Erosion damage control would be performed as necessary throughout the operational periods.

#### **8.4.2.5 Cultural Resources**

Cumulative impacts could occur to archaeological, historic, and traditional Native American cultural sites from the construction of the intermodal transfer stations. Cultural resource surveys of a portion of the Meadow Wash Area have identified two archaeological sites in the vicinity of the proposed Caliente DOE low-level radioactive waste intermodal site (DIRS 103225-DOE 1998, p. 4-13). Neither site falls within the proposed intermodal transfer station areas. However, Native American consultants have identified these archaeological sites as having significant cultural values for present-day Native American tribes, and construction and operation of the intermodal transfer station at this location could create a cumulative impact to these cultural values. DOE would perform ethnographic studies and archaeological surveys during the engineering design phases and before construction to identify these impacts and address their mitigation.

Impacts to cultural resources could occur along each of the candidate rail corridors where site file and literature searches have indicated a potential for archaeological, historic, and traditional cultural properties (see Chapter 3, Section 3.2.2.1.5). Some impacts to these resources could be cumulative, such as the intersection of the National Historic Pony Express Trail by variations of the Carlin Corridor or the construction and operation of a branch rail line in Crescent Valley along the Carlin Corridor, where Native Americans believe that operations at the Cortez Mine have already had an impact on a Native American cemetery. After determining the mode of transportation and the preferred routing, DOE would undertake archaeological field studies and ethnographic evaluations of the corridor to identify further potential impacts and possible mitigative actions to reduce the effects of those impacts.

Some impacts associated with the use of existing highways could be cumulative, depending on the route selected. For example, Native American consultants have identified several places or areas along some of the highways that have cultural significance to regional tribes (see Chapter 3, Section 3.2.2.2.5). Heavy-haul truck traffic could have a cumulative adverse effect on the Goldfield National Register Historic District, although the potential for specific impacts to buildings in the historic district has yet to be fully evaluated. As with other potential components of the Nevada transportation scenario, DOE would complete additional archaeological, historical and ethnographic studies during the engineering design phase to identify and evaluate these types of potential impacts.



#### **8.4.2.6 Socioeconomics**

Employment levels for operation of the repository, Apex, and DOE low-level radioactive waste intermodal transfer stations would be 66, 25, and 14 employees, respectively (Chapter 6 and Section 8.1.2.2). Employment associated with the repository and low-level radioactive waste intermodal transfer stations includes operations personnel and truck drivers. Concurrent operations for all three stations would occur over a portion of the entire 24- or 38-year shipping period for the Proposed Action or Inventory Module 1 or 2, respectively. Employment levels would increase gradually to the maximum values listed above and then decrease gradually toward the end of emplacement activities for repository-related workers. Impacts to employment, population, personal income, Gross Regional Product, and state and local government expenditures during station operations would be small for Lincoln County (Chapter 6, Section 6.3.2.2; DIRS 103225-DOE 1998, pp. 4-14 and 5-9).

The truck traffic in the Caliente area would be increased from the three intermodal transfer stations. The small increase would have a very small impact on U.S. Highway 93, which would be used when entering and leaving the intermodal transfer station access road. U.S. 93 is currently characterized as having light traffic. The period of concurrent truck traffic from the three intermodal transfer stations would also occur only over a portion of the 24- or 38-year shipping duration for the Proposed Action or Inventory Module 1 or 2, respectively.

#### **8.4.2.7 Occupational and Public Health and Safety**

The incremental impacts resulting from an increase in radiological risk associated with the intermodal transfer stations for the repository and low-level radioactive waste shipments at Caliente would not result in a substantial cumulative impact. The estimated total collective worker dose from the entire DOE low-level radioactive waste intermodal shipping campaign, including transportation impacts, would be about 4.21 person-rem (DIRS 103225-DOE 1998, p. 4-10). This dose, added to the total repository intermodal transfer station and rail and heavy-haul truck shipments worker dose of about 2,200 to 3,300 person-rem for the Caliente intermodal transfer station for Inventory Module 1 or 2 (Appendix J, Table J-59) would be an increase of less than 1 percent. The population dose associated with low-level radioactive waste shipments by truck from the Caliente intermodal transfer station would be 7.55 person-rem for the entire shipping campaign (DIRS 103225-DOE 1998, Table C-11, p. C-23). This dose, added to the dose from shipments in Nevada that use heavy-haul trucks of about 600 person-rem over 38 years, would increase the population dose and associated health effects by less than 1 percent.

In addition to incremental impacts resulting from increases in radiological risk, there would be increments in nonradiological impacts of transportation in Nevada that are not included in the national impacts of transporting spent nuclear fuel and high-level radioactive waste to a Yucca Mountain Repository. These increases would arise from 14 additional years of operating a branch rail line or of maintaining highways for use by heavy-haul trucks and operating an intermodal transfer station. The increments in nonradiological impacts for operation of a branch rail line would include increased traffic fatalities from worker commuting and the transportation of spent nuclear fuel and high-level radioactive waste, as well as repository materials. The increases would range from 0.45 to 1.1 fatalities (see Tables 6-78, 6-79, 6-85, 6-86, 6-93, 6-94, J-61, J-62, and J-63).

#### **8.4.2.8 Noise**

There would be an increase in noise levels at Caliente from any of the three candidate intermodal transfer station sites and the associated train switching operations and truck traffic. Noise levels would increase during daytime and night hours for rail activities and during daytime hours for truck shipment activities associated with the repository heavy-haul trucks and the DOE low-level radioactive waste trucks. Apex truck shipments would occur once an hour, 24 hours a day. Noise associated with railcar shipments

would occur as the railcars were uncoupled from trains and transferred in and out of the stations, which could occur during the day or night. Elevated noise levels would occur during loading and unloading operations and briefly as trucks passed on the highway. Trucks would not travel through Caliente for shipments to either Yucca Mountain or the Nevada Test Site. Overall, the elevation of noise levels associated with rail and truck activity near a level that would cause concern would be unlikely. In addition, due to the location of the intermodal transfer stations in an uninhabited canyon area, noise impacts from rail and truck loading and unloading would be low. Cumulative effects would also be limited because operations at the DOE low-level radioactive waste and Apex intermodal transfer stations would overlap only a portion of the shipping campaign associated with the proposed repository.

Future development of the Timbisha Shoshone Trust Lands parcel near Scottys Junction could result in additional impacts. Residences and commercial ventures located near the transportation corridor on this parcel (the Bonnie Claire variation of the Caliente and Carlin rail corridors) could encounter noise levels that would not exceed 90 dB at 15 meters (49 feet) from the route.

#### **8.4.2.9 Aesthetics**

Chapter 6, Section 6.1.2.9 discusses direct impacts from the candidate rail corridors and heavy-haul truck routes. Section 6.3.2 discusses indirect visual impacts as they could affect land use along the rail corridors.

The alteration of the landscape immediately surrounding the Bureau of Land Management Class II lands [within about 8 kilometers (5 miles) of the Kershaw-Ryan State Park] could exceed the Class II objective. In addition, the Wilson Pass Option in the Jean Corridor passes through Class II lands [55 kilometers (34 miles)] in the vicinity of Wilson Pass in the Spring Mountains. Class II designation by the Bureau of Land Management could require retention of the existing character of the landscape. However, the area proposed for the Caliente intermodal transfer station has been classified as Class III, which would require partial retention of the existing character of the landscape. The intermodal facilities would not greatly alter the landscape more than the current passing trains and sewage treatment operations. The Class II lands of the Wilson Pass Option would require retention of the existing character of the landscape. Public exposure would be limited due to obstruction by natural vegetation. Therefore, visual impacts would be very small (DIRS 103225-DOE 1998, pp. 4-12 and 5-8).

#### **8.4.2.10 Utilities, Energy, and Materials**

Electric power lines with adequate capacity are available near the site. Electric power, water supply, and sewage disposal facilities are currently provided to the sewage treatment facility near the proposed location of the intermodal transfer stations (DIRS 103225-DOE 1998, p. 4-12). Therefore, cumulative impacts to utilities would be small. The quantities of concrete, asphalt, and steel needed to build the intermodal facilities (associated mostly with the repository intermodal transfer station) would be unlikely to affect the regional supply system.

#### **8.4.2.11 Management of Intermodal Transfer Station-Generated Waste and Hazardous Materials**

The expected quantities of sanitary waste, small amounts of hazardous waste, and low-level radioactive waste associated with radiological surveys would be unlikely to have large impacts to landfill, treatment, and disposal facilities available for use by this site. Therefore, cumulative impacts for waste management would be small. Only limited quantities of hazardous materials would be needed for station operations, and DOE does not expect these needs to affect the regional supply system (DIRS 103225-DOE 1998, pp. 4-12, 4-13, and 5-8).

#### **8.4.2.12 Environmental Justice**

Because there would be no large cumulative impacts to human health and safety from the construction or operation of the intermodal transfer stations, there would be no disproportionately high and adverse impacts to minority and low-income populations. The absence of large cumulative environmental impacts for the general population means that there would be no disproportionately high and adverse environmental impacts for the minority or low-income communities. An evaluation of subsistence lifestyles and cultural values confirms these general conclusions. The foregoing conclusions and evaluations and the commitment by DOE to ensure minimal impacts to cultural resources show that construction and operation of the intermodal transfer stations would not be expected to cause or contribute to disproportionately high and adverse impacts to Native Americans (DIRS 103225-DOE 1998; pp. 4-14 and 5-9).

### **8.5 Cumulative Manufacturing Impacts**

This section describes potential cumulative environmental impacts from the manufacturing of the repository components required to emplace Inventory Module 1 or 2 in the proposed Yucca Mountain Repository. No adverse cumulative impacts from other Federal, non-Federal, or private actions have been identified because no actions have been identified that, when combined with the Proposed Action or Inventory Module 1 or 2, would exceed the capacity of existing manufacturing facilities.

The overall approach and analytical methods and the baseline data used for the evaluation of cumulative manufacturing impacts for Inventory Module 1 or 2 were the same as those discussed in Chapter 4, Section 4.1.15 for the Proposed Action. The evaluation focused on ways in which the manufacturing of the repository components could affect environmental resources at a representative manufacturing site and potential impacts to material sources and supplies.

Table 8-59 lists the total number of repository components required for the Proposed Action and Inventory Modules 1 and 2. As listed, the total number would increase by approximately 30 to 50 percent for Modules 1 and 2 in comparison to the Proposed Action depending on the operating mode and packaging scenario. The highest total number of repository components would be for Module 2, assuming the lower-temperature operating mode using derated waste packages, and this was the number used in the cumulative impact analysis.

Based on the total number of components that would be required over a 38-year period for Inventory Module 1 or 2, the annual manufacturing rate would remain the same as that for the Proposed Action.

Based on the number of drip shields required over a 12-year period for Inventory Module 1 or 2, the annual manufacturing rate would increase about 30 percent over that for the Proposed Action 10-year drip shield manufacturing period.

Thus, the annual Module 1 or 2 impacts for air quality, socioeconomics, material use, and waste generation would be as much as 30 percent higher than those for drip shield manufacturing discussed in Chapter 4, Section 4.1.15 for the Proposed Action, and these impacts would continue for 12 years rather than the 10 years for the Proposed Action. The total number of worker injuries and illness or fatalities would increase in proportion to the increase in components manufactured. The potential number of injuries and illnesses over the entire 50-year period for Module 1 or 2 would be from 930 to 1,300 and the estimated number of fatalities would be 0.44 to 0.63 (that is, no expected fatalities), depending on the operating mode and packaging scenario. As for the Proposed Action, there would be few or no impacts on other resources because existing manufacturing facilities would meet the projected manufacturing needs and new construction would not be necessary and environmental justice impacts (that is, disproportionately high and adverse impacts to minority or low-income populations) would be unlikely.